



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

OCT 03 1995

James L. Cox
Director of Engineering
and Environmental Affairs
Van Camp Seafood Company, Inc.
4510 Executive Drive, Suite 300
San Diego, CA 92121-3029

Subject: Modification of Waste Stream Monitoring Requirements of
Special Ocean Disposal Permit #OD 93-02 for VCS Samoa
Packing Company

Dear Mr. Cox:

The U.S. Environmental Protection Agency (EPA) Region IX is modifying the above-referenced special ocean disposal permit, as per Section 3.1.2.4 of this permit, effective October 6, 1995. This modification eliminates existing sampling, monitoring and maximum concentration limitations for the three individual waste streams which are the DAF sludge, precooker water and press water. The modification establishes the onshore fish processing storage tank as the new sampling and monitoring location for the combined individual waste streams and also establishes new maximum concentration limitations for the combined wastes (see Table 3 of the attached amendment). The onshore fish processing storage tank is the holding tank for the three individual waste streams prior to ocean disposal. The new maximum concentration limits for the combined waste stream from the onshore fish processing storage tank have been established based on EPA's review and analysis of data per Special Conditions 3.1.2.2. through 3.1.2.4, OD 93-02.

These modifications to the permit are detailed in the attached pages which replace the corresponding pages in the permit and are hereby incorporated into and made a part of the permit, OD 93-02.

Please be reminded that the permit expires August 31, 1996 and that an application for renewal must be submitted at least 180 days prior to its expiration date. Should you have any questions regarding this revision or re-application, please call Pat Young, American Samoa Program Manager at (415) 744-1594 or Allan Ota, Ocean Disposal Coordinator at (415) 744-1980.

Sincerely,

Amy Zimpfer
Chief, Watershed Protection Branch
Water Management Division

2.4. Fish Processing Waste Stream Limits

Table 3. Limits for the Onshore Storage Tank

Physical or Chemical Parameter (units)*	Limits for Onshore Storage Tank
Total Solids (mg/L)	54,590
Total Volatile Solids (mg/L)	58,760
5-Day BOD (mg/L)	87,780
Oil & Grease (mg/L)	48,630
Total Phosphorus (mg/L)	2,820
Total Nitrogen (mg/L)	11,070
Ammonia (mg/L)(mg/L)	5,200
pH (pH units)	5.8 to 7.5
Density (g/mL)	0.97 to 1.03

* All calculated values were rounded to the nearest 10 except density and pH ranges.

- 2.4.1. Permitted Maximum Concentrations were calculated based on an analysis of data gathered by the permittee through bi-monthly sampling of the onshore waste storage tank, from 9/93 to 9/94, as detailed under Section 3.1.2 of the permit. The calculations followed EPA's recommended procedure for determining permit limits as defined in the EPA document titled: Guidance Document for Ocean Dumping Permit Writers, January 30, 1988. (See attached fact sheet for details.)

EPA Region IX will periodically review these limits during the permit to evaluate the accuracy of the limits. If revisions are necessary, EPA Region IX will make changes according to the authority defined in the Ocean Dumping Regulations at 40 C.F.R. §§ 223.2 through 223.5.

- 2.4.2. The Permitted Maximum Concentrations, density range and pH range listed above, shall not be exceeded at any time during the term of this permit.

3. SPECIAL CONDITIONS - ANALYSIS OF FISH PROCESSING WASTES

Compliance with the permitted maximum concentrations defined in Special Condition 2.4 shall be determined by monthly monitoring of the waste stored in the permittee's onshore fish processing waste storage tank. DAF sludge, precooker water and press water are stored in the onshore storage tank prior to ocean disposal. Reporting requirements are defined in this section. Any fish processing waste sampling dates shall be scheduled within the first two weeks of the month to allow enough time for laboratory analyses and report writing to comply with Special Condition 3.3.

3.1. Analyses of Fish Processing Wastes

- 3.1.1. Concentrations or values of the parameters listed in Special Condition 2.4 shall be determined for the waste stream sample from the onshore storage tank during the transfer of these wastes to the disposal vessel's holding tanks. Three samples shall be taken from the onshore storage tank transfer line at 10-minute intervals. These samples shall be composited to produce one sample for analysis. The permittee's samples shall not be combined with fish processing waste from any other permittee. The detection limits specified in Table 4 below shall be used.

Table 4. Physical and Chemical Parameters to be Analyzed from Fish Processing Waste Stored in the Onshore Storage Tank

Parameter	Method Detection Limit
Total Solids	10.0 mg/L
Total Volatile Solids	10.0 mg/L
5-Day BOD	10.0 mg/L
Oil and Grease	10.0 mg/L
Total Phosphorus	1.0 mg/L
Total Nitrogen	1.0 mg/L
Ammonia	1.0 mg/L
pH	0.1 pH units
Density	0.01 g/mL

(Special Conditions 3.1.2, including 3.1.2.1 through 3.1.2.4, are hereby deleted, effective October 6, 1995.)

Revised 10/6/95

VCS Samoa Packing Company